

**DELTACOM, LLC.  
EXAMINATION REPORT ON  
CALL TRACKING SYSTEM  
SEPTEMBER 30, 2012**

**DELTACOM, LLC.**

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## Report of Independent Accountants

To the Board of Directors of  
Deltacom, LLC.

We have examined management's assertion that no material changes have occurred concerning their compliance with Deltacom, LLC.'s call tracking system since September 30, 2011 and that the Company's call tracking system accurately tracks payphone calls to completion in accordance with its representation of compliance set forth on page 3 and 4 of the examination report as of September 30, 2012. Deltacom LLC.'s management is responsible for the assertion. Our responsibility is to express an opinion on the assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence supporting management's assertion and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, management's assertion referred to above is fairly stated, in all material respects, based on Section 64.1310 (a) of Part 64 of the Federal Communications Commission's Code of Federal Regulations as of September 30, 2012.

Our examination was made for the purpose of forming an opinion on management's assertion referred to above. The accompanying information listed as Compensation Dispute Resolution Process in the table of contents is presented for the purposes of additional information and is not a required part of the report. Such information has not been subjected to our examination procedures, and accordingly, we express no opinion on it.

February 26, 2013

**DELTACOM, LLC.**  
**MANAGEMENT'S REPRESENTATION OF COMPLIANCE**  
**SEPTEMBER 30, 2012**

Deltacom, LLC. (the "Company") on behalf of itself and its affiliate, Deltacom, LLC., and Business Telecom, Inc., believes that its call tracking system accurately tracks coinless access code and subscriber toll-free payphone calls to completion in accordance with Section 64.1310(a) of Part 64 of the Federal Communications Commission's Code of Federal Regulations. All calls identified by the Company as calls originating from payphones and also appearing on the National Payphone Clearinghouse ("NPC") Split File with a duration exceeding 0 seconds are identified by the Company as compensable payphone calls. The Company tracks each of those calls to completion. All calls not in compliance with the aforementioned criteria for compensable payphone calls are defined by the Company as noncompensable. In addition, the Company's call tracking system did not experience any material changes since September 30, 2011 concerning its compliance with Section 64.1320 (c) of Part 64 of the Federal Communications Commission's Code of Federal Regulations. The Company uses the NPC as their clearinghouse who ultimately submits payment to payphone service providers on behalf of the Company. The Company submits an electronic file, quarterly, consisting of all completed toll-free calls, based upon the aforementioned criteria, from the Company's call tracking system to NPC. NPC matches the payphone's automatic number identification ("ANI") in the electronic file to those ANI's already in NPC's database and issues payment to Payphone Service Providers accordingly.

In summary, pursuant to Section 64.1320 (c) of Part 64, the Company has implemented the following:

1. The Company has implemented procedures and policies to accurately track payphone originated calls to completion.
2. The Company's representative responsible for tracking, compensating, and resolving disputes concerning payphone calls is Sean Cathey, Senior Manager of Line Cost. Contact information and Dispute Resolution Process information is included in the accompanying information listed as Compensation Dispute Resolution Process in the table of contents. The Company has contracted with NPC as its clearinghouse to make payments on the Company's behalf.
3. The Company has developed data monitoring procedures to track completed payphone records from call origination through to payment.
4. The Company has established internal protocols to ensure that any software, personnel or other network changes do not adversely affect its payphone call tracking ability.

*See Report of Independent Accountants.*

**DELTACOM, LLC.**  
**MANAGEMENT'S REPRESENTATION OF COMPLIANCE (CONTINUED)**  
**SEPTEMBER 30, 2012**

5. The Company submits an electronic file to NPC consisting of all completed toll-free calls and NPC matches the ANI and issues payment to the appropriate Payphone Service Providers.
6. The Company has developed procedures to incorporate call data into required reports through NPC.
7. The Company uses both NPC and designated internal personnel at the Company to resolve any disputes regarding compensation claims.
8. The Company has retained the services of auditors, Himmelwright, Huguley & Boles, LLC, who have concluded their examination of the Company's compliance systems.
9. As noted above, all calls identified by the Company as calls originating from payphones and also appearing on the National Payphone Clearinghouse ("NPC") Split File with a duration exceeding 0 seconds are identified by the Company as compensable payphone calls. All calls not in compliance with the aforementioned criteria for compensable payphone calls are defined by the Company as noncompensable. The Company uses NPC as their clearinghouse who ultimately submits payment to payphone service providers on behalf of the Company. The Company submits an electronic file, quarterly, consisting of all completed toll-free calls, based upon the aforementioned criteria, from the Company's call tracking system to NPC. NPC matches the payphone's ANI in the electronic file to those ANI's already in NPC's database and issues payment to Payphone Service Providers accordingly.

Sincerely,

  
Bradley Ferguson  
Chief Financial Officer  
Deltacom, LLC.

Date: February 26, 2013

*See Report of Independent Accountants.*

**DELTACOM, LLC.**  
**COMPENSATION DISPUTE RESOLUTION PROCESS**  
**SEPTEMBER 30, 2012**

**I. INTRODUCTION**

Instructions on contacting and pursuing Compensation disputes, questions and/or concerns regarding Dial Around Compensation (“DAC”) with Deltacom or BTI are as follows:

Please forward all requests to one of the following addresses (***NO TELEPHONE CALLS PLEASE***):

Sean Cathey  
Deltacom/BTI  
7037 Old Madison Pike  
Suite 400  
Huntsville, AL 35806

OR

[BillySean.Cathey@corp.earthlink.com](mailto:BillySean.Cathey@corp.earthlink.com)

**II. PROCEDURES**

Please provide the following information to assist Deltacom in researching the question or issue:

- 1). The information should be sent in an Excel spreadsheet, Text File or Word Document. Each request should arrive by email or US Mail to the address listed above;
- 2). Please provide the PSP Name and ID number;
- 3). The particular Process (*paid*) and Claim quarter(s) in question;
- 4) The ANI(s) in question; and
- 5). A description of the problem.

**DELTACOM, LLC.**  
**COMPENSATION DISPUTE RESOLUTION PROCESS (CONTINUED)**  
**SEPTEMBER 30, 2012**

**III. RESOLUTION AND PAYMENT PROCESS**

A. Interest

If Deltacom finds that it has not paid for incorrect reasons, Deltacom will pay interest to the PSP upon the release of payment.

B. Response Time

After the PSP has provided Deltacom with all of the appropriate documentation needed to research the issue, Deltacom will respond within a commercially reasonable time frame.

C. Payment Process

Once the issue has been resolved and payment is to be released, the National Payphone Clearinghouse (“NPC”) will issue payments during the next cycle payment process.